

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS)
ENERGY CORPORATION FOR AN ADJUSTMENT) CASE No.
OF RATES AND TARIFF MODIFICATIONS) 2017-00349

ATTORNEY GENERAL'S MOTION FOR PARTIAL DEVIATION

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and respectfully requests a partial deviation from the filing requirements of 807 KAR 5:001 §§ 8(3) and (12)(a), which require a paper copy of electronically filed documents to be filed with the Commission, and from the Commission's Procedural Order dated October 17, 2017, numerical paragraph 3(a), requiring an original and six (6) copies in paper medium of any paper filed by a party with the Commission. In support of this Motion, the Attorney General states as follows.

On February 14, 2018, the Attorney General electronically filed his responses to data requests of the Commission Staff and Atmos Energy Corporation, which required the uploading of numerous lengthy documents. The Attorney General proposes to submit the original and six (6) hard copies of his responses, with the exception of the attachments thereto which if printed would require at least 1,743 pages. In addition to the printing costs associated with producing so many documents, the Attorney General would also incur additional costs for binders, boxes, and labor. The Attorney General simply does not have the resources necessary to accomplish such an undertaking.

Moreover, since many of the documents for which the Attorney General seeks this partial deviation are in their native Excel spreadsheet format, many of the individual sheets

included in the Excel documents, if printed, would be rendered nearly unidentifiable and not readily usable.

All of the documents for which the Attorney General requests such deviation are currently uploaded and fully accessible on the Commission's website for the Commission and the parties to review, and as such form a part of the official record in this case. The titles of the specific documents for which the Attorney General seeks such deviation are listed in case-specific headings in the attached "APPENDIX A" to this Motion. The Attorney General is including with the filing of this motion one CD containing the above-cited attachments.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion for partial deviation.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



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Certificate of Service and Filing










Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on February 14, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.







This 14th day of February, 2018.










































A handwritten signature in blue ink, appearing to be the initials 'ML', is positioned above a horizontal line.

Assistant Attorney General

APPENDIX A

-  2007-SEPT-BOND-RECORD Bond Yields
-  2012 jan bond record Yields
-  2017 FEBRUARY CORPORATE AVERAGE PAGE
-  Binder1
-  Corp Bond Yield Avg
-  Corporate Bond Yield Averages (January 2015)
-  Corporate Bond Yield from 2017 July Bond Record
-  Credit Trends June 10 2016
-  December Bond Record
-  FRB_H15-7
-  June 2016 Corporate Bond Yield Averages
-  Moody's Credit Trends Dec 19 2017
-  The Fed - H15 - Selected Interest Rates (Daily) - December 20, 2017

-  ATO 85.89 0.30 0.35% _ Atmos Energy Corporation - Yahoo Finance
-  ATO
-  Binder2
-  CPK 78.55 -0.25 -0.32% _ Chesapeake Utilities Corporatio - Yahoo Finance
-  CPK
-  NI 25.67 0.11 0.43% _ NiSource Inc - Yahoo Finance
-  NI
-  NJR 40.20 0.50 1.26% _ NewJersey Resources Corporation - Yahoo Finance
-  NJR
-  NWN 59.65 -0.30 -0.50% _ Northwest Natural Gas Company - Yahoo Finance
-  NWN
-  OGS 73.26 -0.14 -0.19% _ ONE Gas, Inc. - Yahoo Finance
-  OGS
-  SJI 31.23 -0.02 -0.06% _ South Jersey Industries, Inc. - Yahoo Finance
-  SJI
-  SR 75.15 -0.20 -0.27% _ Spire Inc. - Yahoo Finance
-  SR
-  UGI 46.95 -0.09 -0.19% _ UGI Corporation - Yahoo Finance
-  UGI

-  ATO 85.89 0.30 0.35% _ Atmos Energy Corporation - Yahoo Finance
-  ATO
-  Binder2
-  CPK 78.55 -0.25 -0.32% _ Chesapeake Utilities Corporatio - Yahoo Finance
-  CPK
-  NI 25.67 0.11 0.43% _ NiSource Inc - Yahoo Finance
-  NI
-  NJR 40.20 0.50 1.26% _ NewJersey Resources Corporation - Yahoo Finance
-  NJR
-  NWN 59.65 -0.30 -0.50% _ Northwest Natural Gas Company - Yahoo Finance
-  NWN
-  OGS 73.26 -0.14 -0.19% _ ONE Gas, Inc. - Yahoo Finance
-  OGS
-  SJI 31.23 -0.02 -0.06% _ South Jersey Industries, Inc. - Yahoo Finance
-  SJI
-  SR 75.15 -0.20 -0.27% _ Spire Inc. - Yahoo Finance
-  SR
-  UGI 46.95 -0.09 -0.19% _ UGI Corporation - Yahoo Finance
-  UGI
-  ATO 84.99 0.39 0.46% _ Atmos Energy Corporation - Yahoo Finance
-  Binder3
-  CPK 77.95 1.05 1.37% _ Chesapeake Utilities Corporatio - Yahoo Finance
-  NI 25.24 0.18 0.72% _ NiSource Inc - Yahoo Finance
-  NJR 39.25 0.60 1.55% _ NewJersey Resources Corporation - Yahoo Finance
-  NWN 58.90 0.30 0.51% _ Northwest Natural Gas Company - Yahoo Finance
-  OGS 73.11 0.73 1.01% _ ONE Gas, Inc. - Yahoo Finance
-  SJI 31.14 0.36 1.17% _ South Jersey Industries, Inc. - Yahoo Finance
-  SR 74.50 0.75 1.02% _ Spire Inc. - Yahoo Finance
-  UGI 46.58 0.10 0.22% _ UGI Corporation - Yahoo Finance
-  ATO_ Atmos Energy Corporation - Detailed Estimates - Zacks.com
-  Binder4
-  CPK_ Chesapeake Utilities Corporation - Detailed Estimates - Zacks.com
-  NI_ NiSource, Inc - Detailed Estimates - Zacks.com
-  NJR_ NewJersey Resources Corporation - Detailed Estimates - Zacks.com
-  NWN_ Northwest Natural Gas Company - Detailed Estimates - Zacks.com
-  OGS_ ONE Gas, Inc. - Detailed Estimates - Zacks.com
-  SJI_ South Jersey Industries, Inc. - Detailed Estimates - Zacks.com
-  SR_ Spire Inc. - Detailed Estimates - Zacks.com
-  UGI_ UGI Corporation - Detailed Estimates - Zacks.com
-  Kollen Attach 1
-  Kollen Attach 2